

***IN THE DISTRICT COURT OF THE UNITED STATES***

***for the Western District of New York***

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**October 2021 GRAND JURY  
(Impaneled 10/6/2021)**

**THE UNITED STATES OF AMERICA      INDICTMENT**

**-vs-**

**JOHN DOUGLAS LOONEY**

**Violations:**

Title 18, United States Code,  
2252A(a)(5)(B) and 2252A(b)(2)  
(3 Counts and Forfeiture Allegation)

**COUNTS 1 THROUGH 3**  
**(Possession of Child Pornography by Individual with Prior Conviction)**

**The Grand Jury Charges That:**

On or about March 1, 2019, in the Western District of New York, and elsewhere, the defendant, JOHN DOUGLAS LOONEY, having previously been convicted under Title 18, United States Code, Section 2252(a)(4)(B), did knowingly possess and access with intent to view the material set forth below that contained images of child pornography, as defined in Title 18, United States Code, Section 2256(8), that involved a prepubescent minor and a minor who had not attained 12 years of age, that had been shipped and transported using any means and facility of interstate and foreign commerce; that had been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer; and that had been produced using materials that had been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer:

<u>COUNT</u>	<u>MATERIAL</u>
1	One (1) Hewlett Packard Pavilion dvG Laptop Computer; Model: dvGt-7000; S/N: 2CE31510XV
2	One (1) Hewlett Packard Pavilion dv7 Laptop Computer; Model: dv7t-6c00; S/N: 2CE2011X6Y
3	One (1) Hewlett Packard Pavilion dvG Laptop Computer; Model: dv6t-6c00; S/N: 2CE2052K0H

**All in violation of Title 18, United States Code, Sections 2252A(a)(5)(B) and 2252A(b)(2).**

**FORFEITURE ALLEGATION**

**The Grand Jury Alleges That:**

Upon conviction of any of the offenses set forth in Counts 1 through 3 of this Indictment, the defendant, JOHN DOUGLAS LOONEY, shall forfeit to the United States, any visual depiction described in Title 18, United States Code, Section 2252A, or any property which contains any such visual depiction, and any property, real or personal, used or intended to be used to commit or to promote the commission of such offense, and all property traceable to such property, including but not limited to the following:

- a. One (1) Hewlett Packard Pavilion dvG Laptop Computer; Model: dvGt-7000; S/N: 2CE31510XV;
- b. One (1) Hewlett Packard Pavilion dv7 Laptop Computer; Model: dv7t-6c00; S/N: 2CE2011X6Y;
- c. One (1) Hewlett Packard Pavilion dvG Laptop Computer; Model: dv6t-6c00; S/N: 2CE2052K0H;
- d. Two (2) Thumb Drives, Color Turn, DT101 G2 16 GB.

**All pursuant to Title 18, United States Code, Sections 2253(a)(1) and 2253(a)(3).**

DATED: Rochester, New York, January 18, 2022

TRINI E. ROSS  
United States Attorney

BY: s/Meghan K. McGuire  
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A TRUE BILL:

s/Foreperson  
FOREPERSON